

ELIZABETH R. STEFFENBERG V. T. GENE GILMAN, ET AL.
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
Civil Action No.: 04-40113 NMG

PRIVILEGE LOG FOR REQUEST # 37
OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
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SCOLL DOES NOT POSSESS ANY PRIVILEGED DOCUMENTS RESPONSIVE TO THIS REQUEST.

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DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
10/13/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
9/15/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
10/12/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with David West, T. Gene Gilman, Tim Oullette, Scoll Gilman, Aleke Msumba re: Commonwealth Financial
10/6/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with Tim Hogan re: Commonwealth Financial
10/4/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
8/8/2002	AC	Invoice	From Attorney Scoll to Commonwealth Financial	Invoice contains content of conference with T. Gene Gilman
8/16/1999	AC	Invoice	From Attorney Scoll to Commonwealth Financial	Invoice contains content of conference with T. Gene Gilman
7/6/1999	AC	Invoice	From Attorney Scoll to Commonwealth Financial	Invoice contains content of conference with T. Gene Gilman
6/7/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
3/30/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
3/4/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
3/12/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: Commonwealth Financial
8/13/1999	WP/OP	Facsimile	From Attorney Scoll to outside counsel for Commonwealth Financial	RE: Commonwealth Financial
7/23/1999	AC/WP/OP	Letter	From Attorney Scoll to T. Gene Gilman	Re: Commonwealth Financial
7/23/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Commonwealth Financial
7/20/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Commonwealth Financial
7/16/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Commonwealth Financial
7/22/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Commonwealth Financial
7/22/1999	AC/WP/OP	Facsimile	From Attorney Scoll to outside	Facsimile contains content of communications from T.

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
			counsel for Commonwealth Financial	Gene Gilman; fax concerns Commonwealth Financial
7/22/1999	AC/WP/OP	Draft Letter	Draft Letter from Scoll to T. Gene Gilman	RE: Commonwealth Financial
7/2/1999	AC/WP/OP	Facsimile	From Attorney Scoll to outside counsel for Commonwealth Financial	Facsimile contains content of communications from T. Gene Gilman; fax concerns Commonwealth Financial
7/1/1999	AC	Facsimile	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial
7/1/1999	AC/WP/OP	Letter	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial
7/1/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Commonwealth Financial
3/1/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Commonwealth Financial
2/12/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial
2/1/1999	AC/WP/OP	Email	From T. Gene Gilman to Attorney Scoll	Re: Commonwealth Financial
2/5/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Commonwealth Financial
2/5/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	RE: Commonwealth Financial
1/27/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with RE: Commonwealth Financial
2/1/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with RE: Commonwealth Financial
1/26/1999	AC	Facsimile	From T. Gene Gilman to Attorney Scoll	Re: Commonwealth Financial
6/7/2000	WP/OP	Draft Legal Documents with notations thereon by T. Gene Gilman faxed to Attorney Scoll		Re: Commonwealth Financial
6/9/2000	AC	Fax	From T. Gene Gilman to Attorney Scoll	Re: Commonwealth Financial
12/15/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman and KPMG

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UNITED STATES DISTRICT COURT
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Civil Action No.: 04-40113 NMG

PRIVILEGE LOG FOR REQUEST # 39-42
OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT, DAVID M. SCOLL

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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

ELIZABETH STEFFENBERG,

Plaintiff,

v.

CIVIL ACTION NO. 04-40113-
FDS

~~T. GENE GILMAN, STEVEN GILMAN, THE GILMAN~~
INSURANCE AGENCY, INC., DAVID M. SCOLL,
ARBOR SECURITIES, LTD., ALLIANCE
INVESTMENT MANAGEMENT, COMMONWEALTH
FINANCIAL HOLDINGS INC., FINANCIAL LINKS,
INC., T. GILMAN & CO., LTD., FIRST ALLIED
SECURITIES, INC., PENSON FINANCIAL SERVICES,
INC., AVIVA USA CORPORATION, TRADETEK,
LTD. and TRADETEK, LLC,

Defendants.

CERTIFICATE OF SERVICE

I, Sara Discepolo, hereby certify that on September 27, 2004, I electronically filed the foregoing *Supplementation to David M. Scoll's Response to Plaintiff's First Request for the Production of Documents* and caused to be served a courtesy copy of the same to all parties/counsel of record by mailing the same via first class mail, postage prepaid, to the following parties:

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Boston, MA 02109

/s/ Sara Discepolo
Sara Discepolo